

BEFORE THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS

STATE CORPORATION COMMISSION

JAN 16 2009

**IN THE MATTER OF A GENERAL  
INVESTIGATION INTO THE  
COMMISSION'S  
CONSIDERATION OF THE  
PUBLIC UTILITY REGULATORY  
POLICY ACT'S ELECTRIC  
STANDARDS AS IMPLEMENTED  
IN THE ENERGY  
INDEPENDENCE AND SECURITY  
ACT OF 2007**

 Docket  
Room

Docket 09-GIME-360-GIE

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**MOTION FOR ADMISSION PRO HAC VICE OF SCOTT H. DEBROFF  
AND ALICIA R. PETERSEN AS ATTORNEYS FOR INTERVENOR,  
ELSTER INTEGRATED SOLUTIONS**

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COMES NOW Charles J. Woodin, an attorney in good standing, licensed to practice law in the State of Kansas, and pursuant to Supreme Court Rule 116 hereby moves the Commission to permit Scott H. DeBroff and Alicia R. Petersen to appear and participate as counsel for Intervenor, Elster Integrated Solutions ("Elster"), in the above captioned Matter. In support of this Motion, the following is submitted:

1. The undersigned attorney has appeared and agreed to act as co-counsel with Mr. DeBroff and Ms. Petersen.
2. Mr. DeBroff is not a Kansas resident, but is a licensed attorney in good standing in Pennsylvania. Mr. DeBroff has never been suspended, disbarred or resigned

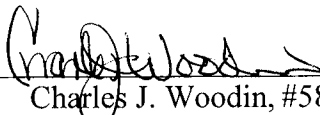
as a result of a disciplinary charge, investigation, or proceeding from the practice of law in any jurisdiction, nor are any such disciplinary proceedings pending.

3. Ms. Petersen is not a Kansas resident, but is a licensed attorney in good standing in Pennsylvania. Ms. Petersen has never been suspended, disbarred or resigned as a result of a disciplinary charge, investigation, or proceeding from the practice of law in any jurisdiction, nor are any such disciplinary proceedings pending.

WHEREFORE, the undersigned moves for the admission Pro Hac Vice of Scott H. DeBroff and Alicia R. Petersen as attorneys for Elster in the above-captioned proceeding and for all other relief proper in the premises.

Respectfully submitted,

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By  \_\_\_\_\_  
Charles J. Woodin, #5807  
*Counsel for Elster Integrated Systems*

### **CERTIFICATE OF SERVICE**

I hereby certify that on the 15th day of January, 2009 the foregoing Motion for Admission Pro Hac Vice was mailed via United States Mail, postage prepaid and properly addressed to:

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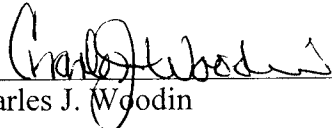
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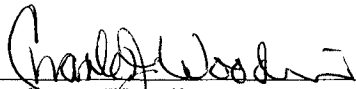
  
\_\_\_\_\_  
Charles J. Woodin

VERIFICATION

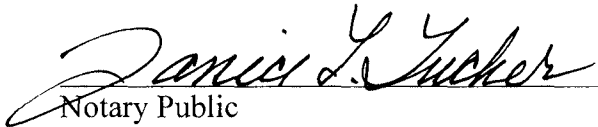
STATE OF KANSAS            )  
  ) ss:  
SEDGWICK COUNTY         )

Charles J. Woodin of lawful age, being first duly sworn on oath, states:

That he is one of the attorneys for Elster Integrated Solutions; that he has read and is familiar with the foregoing Motion for Admission; and that the statements therein are true and correct to the best of his knowledge and belief.

  
\_\_\_\_\_  
Charles J. Woodin

SUBSCRIBED AND SWORN TO before me this 15 day of January, 2009, by Charles J. Woodin.

  
\_\_\_\_\_  
Notary Public

My Appointment Expires:

